

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

KIMBERLY Y. LAFAVE, et al.

Plaintiffs

v.

**THE COUNTY OF FAIRFAX, VIRGINIA,
and KEVIN DAVIS, in his Official Capacity
as Chief of Police**

Defendants

Case No. 1:23-cv-1605 (WBP)

Declaration of Prof. Terence Young

I, Terence Young, declare as follows:

1. I am over the age of 18 years of age and competent to testify to the matters stated below and do so based on my personal knowledge.

2. Attachment A is a true and accurate copy of my expert report in the above-captioned matter. It contains the opinions to which I would testify if called upon as a witness in the above-captioned matter, and I declare under penalty of perjury that it is true and correct to the best of my knowledge.

3. Since completing my expert report, additional historical restrictions on firearms in parks have been located. Attachment B contains copies of the following additional restrictions:

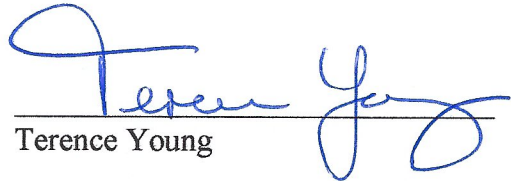
- Ex. 12A: New Haven, CT (1882)
- Ex. 18A: Bridgeport, CT (1889)
- Ex. 39A: Omaha, NE (1898)
- Ex. 39B: Battle Creek, MI (1899)
- Ex. 47A: Baltimore, MD (1904)
- Ex. 56A: Ann Arbor, MI (1907)

- Ex. 56B: Parsons, KS (1907)
- Ex. 60A: Waterbury, CT (1907)
- Ex. 60B: Flint, MI (1908)
- Ex. 64A: Burlington, VT (1910)
- Ex. 67A: New Britain, CT (1911)
- Ex. 69A: Oklahoma City, OK (1913)
- Ex. 70A: Monrovia, CA (1914)
- Ex. 71A: Fresno, CA (1916)
- Ex. 73A: Brockton, MA (1917)
- Ex. 74A: Aurora, IL (1920)
- Ex. 78A: St. Joseph, MO (1925)
- Ex. 100A: District of Columbia (1895)

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 24 day of April, 2024

at Cambria, CA


Terence Young